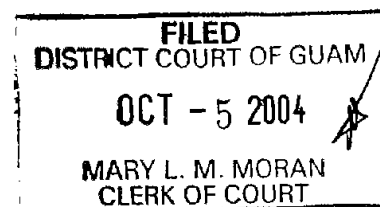


JACQUES G. BRONZE
LAW OFFICES OF BRONZE & TANG

A Professional Corporation
BankPacific Building, Suite 201
825 South Marine Corp Drive
Tamuning, Guam 96913
Telephone No.: (671) 646-2001
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RICHARD A. PIPES
LAW OFFICES OF RICHARD A. PIPES

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825 South Marine Corp Drive
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Telephone: (671) 646-2001

Attorneys for Defendant The Hongkong and Shanghai Banking Corporation Ltd.

IN THE DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU)
SADHWANI, and K. SADHWANI'S)
INC., a Guam corporation,)

Plaintiffs,)

v.)

HONGKONG AND SHANGHAI)
BANKING CORPORATION, LTD.,)
et al.,)

Defendants.)

CIVIL CASE NO. 03-00036

**DECLARATION OF
MA MAN SHUN**

I, MA MAN SHUN, of the Hongkong and Shanghai Banking Corporation Limited ("HSBC") (Hong Kong Office) - Network Services Centre at 12/F, Tower 1, HSBC Centre, 1 Sham Mong Road, Kowloon, Hong Kong, do hereby declare and state as follows:

ORIGINAL

1. I am over eighteen (18) years of age, and employed as a Specialised Function Support Officer of HSBC Hong Kong Office – Account Services Department, and I am responsible for locating information for the courts in relation to cases involving HSBC's bank customers and aiding the compliance of Judgements. In this regard, I am duly authorised by HSBC to make this Declaration on its behalf. Except as otherwise stated, the facts and matters herein are within my own personal knowledge. Facts and matters not within my own knowledge are true to the best of my knowledge, information and belief.

2. I understand HSBC has been ordered by the Courts of Guam to produce to the Plaintiffs in the above action all documents concerning, relating to, or comprising any loan agreements, letters of credit, promissory notes, or other credit facilities extended by HSBC to the following individuals and entities from 1st January 1999 to date, namely:

- (i) a “Joseph K. Fang”;
- (ii) “Joseph K. Fang’s” wife, children, siblings or parents;
- (iii) corporation, partnership, sole proprietorship, company or entity in which “Joseph K. Fang” has any ownership interest;
- (iv) corporation, partnership, sole proprietorship, company or entity in which any member of “Joseph K. Fang’s” family (wife, children, siblings or parents) has any ownership interest;
- (v) Paradise Marine Corporation;
- (vi) corporation, partnership, sole proprietorship, company or entity in which “Joseph K. Fang” is an officer or director; and

(vii) corporation, partnership, sole proprietorship, company or entity in which any member of "Joseph K. Fang's" family (wife, children, siblings or parents) is an officer or director.

3. To enable HSBC to properly conduct the searches to comply with the Guam Court Order, HSBC's Hong Kong solicitors have written to Mr. Joseph K. Fang to request him to provide further information regarding himself and his family members and to secure their consent to release all documents located, consequent upon obtaining their personal details. In this regard, there is now produced and shown to me and marked as Exhibit "**MMS-1**" a true copy of a letter from HSBC's Hong Kong solicitors, Johnson Stokes & Master, to Mr. Joseph K. Fang, dated 19th August 2004. However, I have been advised by Johnson Stokes & Master and verily believe that Mr. Fang has refused to provide further information to HSBC. True copies of the email from Mr. Fang and the facsimile from his US Attorneys, dated 24th August 2004, are now produced and shown to me and marked as Exhibit "**MMS-2**".

4. In this connection, I understand Mr. Joseph K. Fang has previously stated in his deposition in the US that he used to work for HSBC some years ago and that his wife is called Maria Chen, and he has a number of siblings and two of them are called "Derick" and "Felix". Consequently, I have made enquiries with the Human Resources Department of HSBC (Hong Kong) office to ascertain whether it still has, in its possession, the correct "Joseph K. Fang's" employment records and whether those records list his ID Card number, the details of his children, siblings or parents. However, according to my enquiry, HSBC no longer has such record in its possession, power or control. Records of former employees are only kept for a maximum period of 7 years.

5. I should explain that HSBC's customer database in Hong Kong does contain information relating to all Hong Kong customers of HSBC. To locate information relating to a

particular customer, one would need the customer's Hong Kong Identity Card Number or Passport Number to conduct the searches properly. Where one is required to conduct a name based search without the customer's Hong Kong Identity Card Number or Passport Number, it is impossible to verify that the results relate to the customer being searched for, since the account-holders could have the same Chinese surnames and Christian names.

6. With the limited information on hand, on 19 August 2004, I conducted a search of the HSBC Hong Kong customer database to produce a listing of accounts concerning, relating to, or comprising any loan agreements, letters of credit, promissory notes or other credit facilities extended to:

(i) all persons with the surname "Fang" with the forenames of "Joseph", "Maria", "Derick" and "Felix"; and

(ii) all entities whose director, shareholder, partner, proprietor are known to HSBC with the surname "Fang" with the forenames of "Joseph", "Maria", "Derick" and "Felix".

7. Furthermore, on the same day, I conducted a search of the HSBC Hong Kong customer database to produce a listing of accounts concerning, relating to, or comprising any loan agreements, letters of credit, promissory notes or other credit facilities extended to:

(i) all persons with the surname "Chen" with the forename of "Maria"; and

(ii) all entities whose director, shareholder, partner or proprietor are known to HSBC with the surname "Chen" with the forename of "Maria".

8. After identifying the potential matches, I then instructed my subordinates to review the information/documents stored in our computer system regarding the accounts of these potential matches, and to retrieve all relevant hard copy documents (such as loan agreements and facility letters etc.) that could be found in our system. Having said this, letters of credit and promissory

notes are not stored in our customer database. Accordingly, on 24th August 2004, I contacted the relevant Relationship Managers in charge of the accounts of the potential matches to ascertain if any letters of credit or promissory notes were extended by HSBC to the potentially relevant parties.

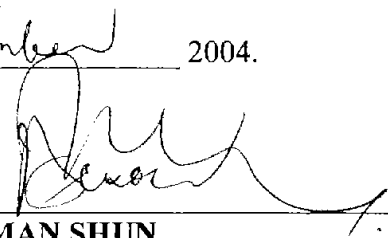
9. I should explain that the surnames "Fang" and "Chen" are not uncommon surnames in Hong Kong. According to my name based searches, a number of account-holders with the same names or similar names have been identified, and in some instances, accounts with overdraft facilities have been located. However, I cannot verify (and have no means to verify) whether these accounts actually belong the correct parties, as we do not have the details of their passports or Hong Kong Identity Cards.

10. For the avoidance of doubt, we have found no information in our Hong Kong database relating to the company called "Paradise Marine Corporation".

11. I have not been able to make further searches without having further information from Mr. Fang.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED this 14 day of September 2004.



MA MAN SHUN

EXHIBIT "MMS-1"

Johnson
Stokes
& Master

孖士打律師行

Mr. Joseph K. Fang

Our Ref: AWCL/H2/04/6716699/4

Your Ref:

Direct Tel: 2843 4536

Direct Fax: 2103 5158

Date: 19th August 2004

By Email: jkfang@pacbell.net

Dear Mr. Fang,

Re: **Alan Sadhwani, et al. v. Hongkong and Shanghai
Banking Corporation Ltd., et al (in the United States
District Court of Guam) Civil Case No. 03-00036**

We are the legal advisers of the Hongkong and Shanghai Banking Corporation Ltd. ("HSBC").

As you are probably aware, Mr. Sadhwani, his wife and his company are currently pursuing their claims in Guam against HSBC in connection with the loan that was assigned by HSBC to your company, Paradise Marine Corporation.

In this connection, Mr. Sadhwani has recently obtained a Guam Court Order directing HSBC to produce all information and documents relating to any loan agreements, letters of credit, promissory notes or other credit facilities extended by HSBC to you, your wife, your children, siblings, parents and business entities in which you or your family members have any ownership interest, or business entities in which you or your family members held a position of officer or director. For your information, a redacted copy of Mr. Sadhwani's Request for information and documents, which has been endorsed by Guam Court, is attached

As you would appreciate, HSBC has business operations in the US, and is subject to the jurisdiction of Guam Court. Consequently, HSBC has no choice but to comply with the Guam Court Order because if it declines to do so, it would be subject to proceedings for contempt of Court, and could be ordered to pay daily fines until compliance.

By this letter, we are instructed to write to you to request for the names and details of your family members and business entities in which you or your family member have/had any interest (as more particularly referred to in Mr Sadhwani's Request), such that HSBC may search its records in Hong

16th-19th Floors

Prince's Building

10 Chater Road

Central

Hong Kong

香港中環

遮打道10號

太子大廈16-19樓

Tel 電話

(852) 2843 2211

Fax 傳真

(852) 2845 9121

E-mail 電郵

jsmhk@jsm.com

www.jsm.com

Kong to collate the requested documents, if they exist. We should also be obliged if you and your family members would give consent to HSBC to disclose the requested information and documents following the search.

In view of the urgency of this matter, we would appreciate if you could kindly revert to us on this matter before 12 noon on 21st August 2004.

Meanwhile, if you have any questions regarding the above, please do not hesitate to contact us.

Yours faithfully,

Johnson Stokes & Master
Johnson Stokes & Master

c.c. McCully & Beggs - Attn: Duncan G. McCully, Esq.
By Fax No.: (671) 472 1201

L37B/cw

JOAQUIN C. ARRIOLA
 ANITA P. ARRIOLA
 ARRIOLA, COWAN & ARRIOLA
 259 Martyr Street, Suite 201
 Hagatña, Guam 96910
 Telephone: (671) 477-9730/33
 Facsimile: (671) 477-9734

Counsel for Plaintiffs Alan Sadhwani, et al.

IN THE UNITED STATES DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU
 SADHWANI, and K. SADHWANI'S
 INC., a Guam corporation,

Plaintiffs,

vs.

HONGKONG AND SHANGHAI
 BANKING CORPORATION, LTD., a
 Foreign corporation, JOHN DOE I
 through JOHN DOE X,

Defendants.

CIVIL CASE NO. 03-00036

PLAINTIFFS' THIRD SET OF
 REQUESTS FOR PRODUCTION OF
 DOCUMENTS

BRONZE & TANG, P.C.	
Date:	3/8/04
Time:	4:00 PM
Received:	[Signature]

TO: DEFENDANT HONGKONG SHANGHAI BANKING CORPORATION, LTD.
 AND ITS COUNSEL OF RECORD JACQUES A. BRONZE

Plaintiffs Alan Sadhwani, et al. request that defendant produce and permit plaintiffs to inspect and to copy each of the following documents.

The place of inspection shall be Arriola, Cowan & Arriola, 259 Martyr Street, Suite 201, Hagatna, Guam 96910. The date and time for inspection shall be April 7, 2004, at 9 a.m., and continuing so long as is reasonably required.

DEFINITIONS

As used herein, the following definitions shall apply:

a. YOU and YOUR means HongKong Shanghai Banking Corporation, Ltd. ("HSBC"), its predecessors, agents, employees, representatives, attorneys, officers, assistants, directors, and consultants, including any experts YOU expect to call as witnesses in this action.

b. "DOCUMENTS" includes, but not to be limited to, handwriting, typewriting, printing, photostating, photographing, and every other means of recording upon any tangible thing, any form of communication or representation, including letters, words, pictures, sounds, or symbols, or combinations thereof, and any written, recorded, or graphic matter however produced or reproduced, including, but not limited to, electronic files, documents, records or data, documents stored in or retrievable by computer, memoranda, reports, studies, analyses, contracts, agreements, checks, charts, graphs, indices, data sheets, computer disks, data processing cards or tapes, notes, post-its, work papers, entries, letters, telegrams, telecopies (including facsimiles), internal memoranda, advertisements, brochures, circulars, catalogs, tapes, records, bulletins, papers, books, pamphlets, accounts, calendars, or diaries. The term "document" or "documents" shall also include any carbon or photographic or any other copies, reproductions, or facsimiles or any original, and shall mean the original or any copy or reproduction or facsimile that is in any way different from the original.

c. "Plaintiffs' Loan" means Installment Loan No. 10003-361, with HSBC as Lender and the plaintiffs as Borrower/Guarantors.

d. "PMC" means Paradise Marine Corporation.

REQUESTS FOR PRODUCTION OF DOCUMENTS

The documents to be produced are:

1. All DOCUMENTS concerning, relating to, or comprising any loan agreements, letters of credit, promissory notes, or other credit facilities extended by YOU to Joseph K. Fang from January 1, 1999 through the date of this request.

2. All DOCUMENTS concerning, relating to, or comprising any loan agreements, letters of credit, promissory notes, or other credit facilities extended by YOU to any member of Joseph K. Fang's family (wife, children, siblings or parents) from January 1, 1999 through the date of this request.

3. All DOCUMENTS concerning, relating to, or comprising any loan agreements, letters of credit, promissory notes, or other credit facilities extended by YOU to any corporation, partnership, sole proprietorship, company or entity in which Joseph K. Fang has any ownership interest, from January 1, 1999 through the date of this request.

4. All DOCUMENTS concerning, relating to, or comprising any loan agreements, letters of credit, promissory notes, or other credit facilities extended by YOU to any corporation, partnership, sole proprietorship, company or entity in which any member of Joseph K. Fang's family (wife, children, siblings or parents) has any ownership

interest, from January 1, 1999 through the date of this request.

5. All DOCUMENTS concerning, relating to, or comprising any loan agreements, letters of credit, promissory notes, or other credit facilities extended by YOU to PMC from January 1, 1999 through the date of this request.

6 All DOCUMENTS concerning, relating to, or comprising any loan agreements, letters of credit, promissory notes, or other credit facilities extended by YOU to any corporation, partnership, sole proprietorship, company or entity in which Joseph K. Fang is an officer or director, from January 1, 1999 through the date of this request.

7 All DOCUMENTS concerning, relating to, or comprising any loan agreements, letters of credit, promissory notes, or other credit facilities extended by YOU to any corporation, partnership, sole proprietorship, company or entity in which any member of Joseph K. Fang's family (wife, children, siblings or parents) is an officer or director, from January 1, 1999 through the date of this request.

ARRIOLA, COWAN & ARRIOLA, HAGATHA, SUAM 96910

ARRIOLA, COWAN & ARRIOLA, HAGATHA. GUAM 96910

ARRIOLA, COWAN & ARRIOLA
Attorneys for Plaintiffs Alan Sadhwani, et al.

By: Anita P. Arriola
ANITA P. ARRIOLA

EXHIBIT "MMS-2"

Lam, Anita W.C.

From: Joe Fang [jkfang@pacbell.net]
Sent: 24 August 2004 PM 10:15
To: Lam, Anita W.C.
Cc: Duncan McCully; Christopher Page
Subject: Re: Alan Sadhwani, et al v Hongkong and Shanghai Banking Corporation Ltd., et al (in the United States District Court of Guam) Civil Case No.03-00036 (Ref: AWCL-H2-04-6716699-4))

8-24-04

Dear Ms. Lam,

Thank you for your message, and the attachment.

I have already informed Mr. Christopher Page, and Mr. Richard Bennett, of HSBC, that I am strongly opposed to the Bank releasing any information relating to our relationship with the Bank. We are prepared to file an injunction in the courts of Hong Kong to that effect, and you will be hearing from our legal counsel shortly.

Sincerely,

Joseph Fang

----- Original Message -----

From: Lam, Anita W.C. <mailto:anita.lam@jsm.com>

To: 'jkfang@pacbell.net' <mailto:'jkfang@pacbell.net'>

Sent: Thursday, August 19, 2004 1:00 AM

Subject: Alan Sadhwani, et al v Hongkong and Shanghai Banking Corporation Ltd., et al (in the United States District Court of Guam) Civil Case No.03-00036 (Ref: AWCL-H2-04-6716699-4))

Dear Mr. Fang,

Please see attached.

<<137B - Mr. Joseph K. Fang - 19-8-04.pdf>>

Yours faithfully,
Johnson Stokes & Master

Johnson Stokes & Master
16th-19th Floors, Prince's Building
10 Chater Road, Hong Kong
Telephone: (852) 2843 2211
Website: www.jsm.com
A list of partners in Johnson Stokes & Master can be provided upon request.

This message is confidential and may be covered by legal professional privilege. If you have received this message in error, please delete it from your system. If you require assistance, please contact us.

Attachments to this e-mail may contain software viruses that could damage your computer system. Whilst we take reasonable precautions to minimise this risk we do not accept liability for any damage which may result from software viruses. You should carry out your own virus checks before opening any attachment.

Please note that errors can occur in electronically transmitted materials. We do not accept liability for any such errors. If verification is required please ask for a hard copy.

McCULLY & BEGGS, P.C.
Attorneys At Law

FACSIMILE TRANSMITTAL SHEET

TO: Ms. Anita Lam	FACSIMILE: (852) 2103-5158
CC: Paradise Marine Corporation	FACSIMILE: (415) 354-3277
Jacque Bronze, Esq.	FACSIMILE: (671) 647-7671

FR: Duncan G. McCully, Esq.	FACSIMILE: (671) 472-1201
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Total No. of Pages (including cover): -3-	DATE: August 24, 2004
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Re: Sadhwani et. al. vs. Paradise Marine; F#3776

FOR YOUR INFORMATION & FILES:

1. Letter dated August 24, 2004 to Ms. Anita Lam from Mr. McCully. (2 pp.)

Suite 200, 139 Murray Blvd.
Hagatna, Guam 96910
Telephone: 671-477-7418
Facsimile: 671-472-1201
e-mail: mblaw@kuentos.guam.net

McCULLY & BEGGS, P.C.
ATTORNEYS AT LAW

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(671) 477-7418

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DUNCAN G. McCULLY
MARK S. BEGGS

SUITE 200, 139 MURRAY BOULEVARD
HAGATÑA, GUAM 96910

mblaw@kuentos.guam.net

August 24, 2004

VIA FACSIMILE: 2103-5158

MS. ANITA LUM
Johnson, Stokes & Master
Hong Kong

Re: Alan Sadhwani et.al vs. Hongkong and Shanghai Banking
Corp. United States District Court of Guam; CV03-00036
MB File No. 3776

Dear Ms. Lum:

I want to respond to your law firm's letter of August 19, 2004 and confirm our telephone conversation of this morning.

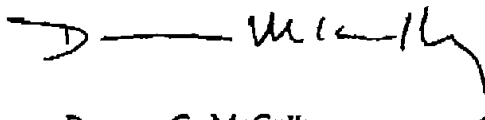
Joseph Fang and his wife Maria Fang object to the Hongkong and Shanghai Banking Corporation ("HSBC") producing or otherwise disclosing any information or documents relating to any loan agreements, letters of credit, promissory notes or other credit facilities extended by HSBC to them, their children, siblings, parents, and business entities in which they or their family members have any ownership interest or where they held positions as officers or directors. Similarly, Dr. and Mrs. Fang decline to provide HSBC with the names and other details of the members of their families or their business entities. Dr. and Mrs. Fang consider the District Court's order to be a gross and unjustified intrusion on the confidentiality of their financial dealings with HSBC. Such information is in no way related to Paradise Marine's purchase of HSBC Guam's loan from K. Sadhwani, Inc. It is their understanding that such confidentiality is protected by the laws of Hong Kong.

Dr. Fang intends to retain lawyers in Hong Kong to prevent HSBC from disclosing any confidential financial information concerning his and his wife's personal and business affairs. Under no circumstance is HSBC to consider that Dr.

and Mrs. Fang have given their consent or authorization to any kind of release, unless it receives such consent in writing. I have been further instructed to inform you that Dr. and Mrs. Fang will hold HSBC responsible if it discloses or release any confidential information relating to any loan facility, without their advance written consent.

Please let me know if you have any questions or comments concerning this letter. Kindest regards.

Sincerely,

A handwritten signature in black ink, appearing to read "Duncan G. McCully", with a stylized flourish at the end.

Duncan G. McCully

cc: Paradise Marine Corporation
Jacque Bronze, Esq.